

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

Samantha Chandler,

Plaintiff,

v.

No. _____

Tarrant County,

Defendant.

Notice of Removal

The Defendant, Tarrant County, removes Cause No. 236-329921-21 from the 236th Judicial District for Tarrant County, Texas to the United States District Court for the Northern District of Texas pursuant to 28 U.S.C. §§ 1441 and 1446. As grounds for this removal, the County shows as follows:

Statement of the Case

1. The Plaintiff, Samantha Chandler, sued the County in the District Court for the 236th Judicial District in Tarrant County, Texas styled *Samantha Chandler v. Tarrant County*, No. 236-329921-21 (“State Court Action”).

2. Chandler caused the County to be served with process on October 28, 2021. The County has not answered in the State Court Action.

3. In her Original Petition, Chandler alleges that the County violated Title VII of the Civil Rights Act. Specifically, she claims that the

County violated the Pregnancy Discrimination Act. She also claims that the County wrongfully terminated her employment after she informed the County that she was pregnant.

Federal Question Jurisdiction

4. Chandler alleges violations of the Civil Rights Act of 1964, § 701(k), as amended by the Pregnancy Discrimination Act, 42 U.S.C.A. § 2000e(k). Thus, the case presents a federal question for which the Court has original jurisdiction. 28 U.S.C. § 1331. Accordingly, removal is appropriate under U.S.C. § 1441(a).

All Procedural Requirements Have Been Satisfied

5. The County has attached to the Notice of Removal certified copies of all the process, pleadings, docket sheet, documents from the State Court Action, in compliance with 28 U.S.C. § 1446(a) and Local Rule 81.1(4) as follows:

Exhibit 1 – Index of State Court Documents

Exhibit 2 – State Court Action Docket Sheet

Exhibit 3 – State Court Action Original Petition

Exhibit 4 – State Court Action Return of Service of Citation

The County also files the completed civil cover sheet, supplemental cover sheet, and certificate of interested persons as required by Local Rule 81.1.

6. Chandler alleges that she resides in Fort Worth, Texas. Tarrant County is a political subdivision of the State of Texas and is located within the boundaries of the United States District Court for the Northern District of Texas. Thus, the Court has personal jurisdiction over

the parties. Further, venue is proper because the Fort Worth division embraces the court in which the State Court Action is pending. 28 U.S.C. § 1441(a).

7. The County files this Notice of Removal within 30 days of the date it was served with process (October 28, 2021). Therefore, the removal is timely under 28 U.S.C. § 1446(b).

Conclusion

In filing this Notice of Removal, the County does not waive any defenses or objections it may have to this action. The County intends no admission of fact, law, or liability and expressly reserves all defenses, motions, and/or pleas.

Respectfully submitted,

SHAREN WILSON

Criminal District Attorney
Tarrant County, Texas

s/ Stephen A. Lund

STEPHEN A. LUND

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Attorney for Defendant, Tarrant County

Certificate of Service

On November 12, 2021, I served a copy of the above document as follows:

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Mansfield, TX 76063
ali@cralawfirm.com

Via U.S. Mail & Email

s/ Stephen A. Lund

STEPHEN A. LUND